

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

In re

CITY OF DETROIT, MICHIGAN,

Debtor.

No. 13-53846

Chapter 9

HON. STEVEN W. RHODES

**STATE OF MICHIGAN'S SUPPLEMENTAL RESPONSE TO
SYNCORA'S SUBPOENA DUCES TECUM
(DKT. #3315)**

The State of Michigan provides the following supplemental response to Syncora's Subpoena Duces Tecum:

1. On May 16, 2014, the State personally served on Syncora's counsel, pursuant to the stipulated agreement of counsel for the subpoena parties, its electronic discovery produced in response to the Official Committee of Retirees' Subpeona Duces Tecum (DKT. #4034). This consisted of a CD-rom containing a searchable electronic version of certain responsive documents and "slip pages" identifying documents that were withheld because of privilege, confidentiality or because they were non-responsive.

Certain documents in that electronic production were identified as withheld without explanation; one document was incorrectly withheld. The enclosed CD-rom entitled “State of Michigan/Office of Attorney General City of Detroit Bankruptcy II MICH000000001- MICH00003111 May 19, 2014” is a supplemental version of the State’s electronic discovery that corrects and properly identifies those documents withheld without explanation and producing the one document that was incorrectly withheld. The Production Bates # represents the page on which the corrected explanation is found and the number for the production document:

Production Bates #	Explanation
MICH00000304	withheld as non-responsive
MICH00000305	withheld as non-responsive
MCH00000348	withheld as privileged – See Priv-001354
MICH00000351	withheld as non-responsive
MICH00000352	withheld as non-responsive
MICH 00000353	withheld as privileged – See Priv-001355
MICH00000763	withheld as non-responsive
MICH00000865	withheld as non-responsive

MICH00000868	withheld as non-responsive
MICH00000876	withheld as non-responsive
MICH00000877	withheld as non-responsive
MICH00000878	withheld as non-responsive
MICH00000879	withheld as non-responsive
MICH00001798	withheld as non-responsive
MICH00001831	withheld as non-responsive
MICH00003050	incorrectly withheld – Provided
MICH00003069	withheld as non-responsive
MICH00003070	withheld as non-responsive

2. The State of Michigan's Privilege Log is included with this Corrected and Supplemental Response.

/s/ Matthew Schneider
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